Arrowsmith Timber Supply Area
Timber Supply Review

Summary of Public Input

BC Ministry of Forests
South Island Forest District
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This is a summary of the public input received on the Timber Supply Review in the Arrowsmith Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

104-01773/

Arrowsmith Timber Supply Area

Background

As part of the review of timber supply in the Arrowsmith Timber Supply Area (TSA), two opportunities were provided for public input. The first followed release of the Arrowsmith TSA *Data Package* and *Information Report* in May 2000. The *Information Report* was a non-technical summary of the draft data and management assumptions that were to be applied in reviewing the timber supply for the Arrowsmith TSA. A 30-day review period, ending June 12, 2000, was provided for the public to comment on these documents.

On September 25, 2001, the British Columbia Forest Service released the *2001 Arrowsmith Timber Supply Area Analysis Report* and *Public Discussion Paper*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information during the seven-week review period that ended November 13, 2001.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut (AAC) for the Arrowsmith TSA. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the South Island Forest District office in Port Alberni.

Public Review Process and Response

Staff from the South Island Forest District actively solicited public input on the Timber Supply Review in the Arrowsmith TSA through the following actions:

- copies of the *Data Package* were mailed to local governments, First Nations, MLAs, forest licensees and government agencies.
- copies of the *Public Discussion Paper* and the *Analysis Report* (which includes the socio-economic analysis) were mailed to stakeholders in the TSA, including First Nations, licensees, Small Business Program registrants, businesses, local governments and environmental groups. The dates of upcoming meetings and open houses were provided.
- the *Data Package* and *Analysis Report* were available at the district office in Port Alberni and at the regional office in Nanaimo.
- newspaper advertisements were placed, advising of the availability of all documents for review by the public and of the schedule of public open houses on the *Analysis Report*.
- copies of all the documents were made available to the local media. Interviews were conducted with the local radio and newspaper.
- referrals were made to the Ministry of Forests website where documents were available to download.

As Table 1 shows, several information sessions and open houses were held on the *Arrowsmith Timber Supply Area Analysis Report*. However, most of the meetings and open houses were poorly attended, the latter averaging about five people.

The forest district and regional offices received four written submissions on the *Data Package* and eight submissions on the *Analysis Report* (see Appendix 1).

Activity	Date
Information sessions	
Local government	
District of Nanaimo	Oct. 2/01
Alberni/Clayoquot Regional District	Oct. 3/01
Cowichan Valley Regional District	Oct. 24/01
Comox/Strathcona Regional District	Oct. 30/01
First Nations	
West Coast First Nations	Oct. 10/01
East Coast First Nations	Oct. 11/01
Others	
Non-gov't organizations	Oct. 9/01
Gov't agencies	Oct. 12/01
Licensees	May 25/00 & Oct. 16/01
Clayoquot Central Region Board	Oct. 26/01
Open houses	
Tofino/Ucluelet	Oct. 4/01
Pt. Alberni	Oct. 15/01
Duncan	Oct. 23/01
Nanaimo	Oct. 24/01

Table 1: Dates and locations of meetings and public open houses

Public Input

In this section, public input on the information presented in the Timber Supply Review documents for the Arrowsmith TSA is summarized under the following headings:

- Data Package (and Information Report)
- Timber Supply Area Analysis Report (and Public Discussion Paper)
- Other comments

Data Package

Roads, Trails and Landings
The Coulson Group says the use of the mapping exercise to estimate the land base lost to roads is acceptable, but that the average width used (20 metres) is a gross overestimation. They suggest using a 10-metre width in the Barclay Supply Block and an 8-metre width in the Nanaimo Supply Block. The Group says they also disagree with an allowance for new roads to access commercial thinning, saying that existing roads are used and these have already been included in the reduction for permanent roads.

Community Forests
The Coulson Group says AAC reductions to account for community forests should be applied against the Small Business Forest Enterprise Program only, and not against major tenure holders. The Group says the small business program has the majority of the AAC allocation, while small replaceable tenures have recently had significant AAC reductions that have threatened their viability.

Cultural Heritage Values
The Coulson Group says the proposed seven per cent reduction from all cedar types within 200 metres of the ocean shoreline to protect cultural heritage values is excessive. They say their experience in Arrowsmith and Strathcona TSAs indicates that land base reductions have been very few and, when they were made, only involved two to three hectares. The Group suggests a two per cent reduction to protect these values, and that actual operational reductions be traced in order to validate this assumption.

Timber Supply Area Analysis Report

Land Base Factors
Greenmax Resources says they strongly disagree that fragmented areas should be removed from the working forest. They say woodlot licences are specifically designed to manage small parcels of land on a sustainable basis that is acceptable to the community. Greenmax claims that the South Island Forest District failed to take advantage of the

opportunity to create new and/or expanded woodlot licences. They also point to various conflicting statements in the *Analysis Report* about these fragmented areas and their effect on timber supply.

Greenmax also expresses concern about the removal of Crown lands on the southern Gulf Islands from the timber harvesting land base (THLB). They say they require evidence that forest development plans were not approved, before commenting further.

Woodlots and Community Forest Licences
Greenmax says that portraying woodlots as one of the primary reasons for reductions in the AAC is misleading and unsupportive of their important role, noting that there is in fact only one woodlot of 331 hectares. The company says removing woodlot licenses from the land base considered in the timber supply analysis does not reduce the true availability of forest resources, unlike parks, wildlife tree patches, etc.

The Cowichan Tribes say a Community Forest Pilot Agreement was signed with them in February, 2001, providing an AAC of 20,000 cubic metres. The land base is to come from the small business program area and negotiations are underway to determine the boundaries of the area; this should be accounted for in netdowns to the THLB, according to this submission. The Hul'qumi'num Treaty Group expresses support for this recommendation.

Silviculture Systems
Greenmax says it is difficult to understand the section of the *Analysis Report* dealing with retention harvesting, and maintains there is little science to support the assumptions in this section.

Recreation Values
The submission from the Western Canada Wilderness Committee (WCWC) says that on the east coast of Vancouver Island, two per cent of the land base has been set aside for conservation, recreation and tourism needs, yet 87 per cent of the population of the island lives within this area. The group says heavy recreational use of the two per cent means red-listed plant communities become toilets, campsites, riding trails, etc. WCWC says the expanding population indicates a greater need for recreation areas.

Riparian Management
The Cowichan Tribes say intact and well-managed riparian zones provide fish habitat (central to Cowichan culture) and areas for spiritual and cultural activities, as well as supporting essential ecosystem processes. They say the provisions of the Forest Practices Code, and therefore the land base netdown in the timber supply analysis, are insufficient to protect riparian areas. In particular, the Cowichan Tribes say the width of riparian management zones must be increased and small fish-bearing streams and streams that are not "known" to have fish in them must also be protected. The Hul'qumi'num Treaty Group expresses support for these recommendations.

Landscape Biodiversity
The Cowichan Tribes say adequate representation of mature and old forests across the landscape is necessary to maintain ecological integrity and function throughout their traditional territory. They express concern about insufficient representation of such forests given the high proportion of private lands adjacent to the TSA and the limited regulatory control over them. The Cowichan Tribes request the chief forester to require that seral stage targets be met immediately in all landscape units at the biogeoclimatic variant level, noting that the sensitivity analyses demonstrate a negligible effect on short- and long-term harvest levels from meeting these requirements. The Hul'qumi'num Treaty Group expresses support for this recommendation.

The Hupacasath First Nation say they do not support the liquidation of old-growth

forests in the TSA, saying this has a direct, negative impact on their ability to exercise their aboriginal rights (e.g., sacred and spiritual practices, accessing canoe logs). They also express concern about the impact of this policy on ecosystem sustainability.

WCWC says they're pleased the Sensitive Ecosystem Inventory for the East Coast of Vancouver Island has been completed and the area has been recognized as a high priority for restoration and conservation. The group says that due to the high biodiversity values, 20 to 30 per cent of the region needs to be protected to maintain the species present. WCWC also questions the Ministry of Forests' goals for maintaining and restoring older second-growth forests.

Cultural Heritage Values

The Hupacasath First Nation says detailed discussions are needed immediately to identify areas requiring protection based on their needs and values, and to determine if these areas need to be removed from the THLB to ensure proper protection. They also request more information on the Archaeological Overview Assessment referred to in the *Analysis Report*.

The Cowichan Tribes say that while they believe that removing significant sites from the THLB best protects cultural and heritage values, a netdown of 137 hectares is not sufficient. They also say the criteria used to define areas with potential features are inappropriate (e.g., the statement that potential areas must be less than 200 metres from the ocean; they say significant sites are found throughout the landscape). The Cowichan Tribes say archaeological assessments should be conducted on all TSA lands within their traditional territory and this information should inform the decision on netdowns. The Hul'qumi'num Treaty Group expresses support for these recommendations.

First Nations

The Cowichan Tribes say a substantial portion of the Crown land within their traditional territory is within the Arrowsmith TSA, and they wish to advise of the existence of their aboriginal title to these lands and resources. The Cowichan Tribes express concern that Timber Supply Review decisions will alienate land and resources within their territory before a treaty has been concluded, and say this constitutes bad faith negotiations unless their consent is given. Given that the Delgamuukw decision required that aboriginal title be given a priority, the Cowichan Tribes call on the chief forester to assume the fiduciary responsibility of the Crown and prioritize aboriginal title by:

- removing some land from the THLB to ensure that land that has not been recently harvested is available for treaty settlement; and/or,
- establishing an AAC that is sufficiently low to ensure it can be apportioned so that Crown land within their traditional territory is not harvested prior to treaty settlement.

The submission from the Hul'qumi'num Treaty Group (HTG) says the Arrowsmith TSA makes up the vast majority of Crown land in Hul'qumi'num traditional territory. The HTG chiefs say the rate of harvest from their aboriginal title lands must not compromise the forest resources available for Interim Measures and final treaty settlements. Noting that about 40 per cent of the THLB is within HTG traditional territory, the HTG recommends that:

- a portion of the aboriginal title lands be removed from the THLB, including a significant portion of the Vancouver Island Plantation Lands within the HTG core traditional territory as these lands have been selected as settlement lands in treaty negotiations; and,
- the AAC be set at a sufficiently low level to accommodate the goals of retaining the current and future quality of the mature forest resource in HTG lands.

The HTG submission also expresses the opinion that First Nations title interests and the social and economic goals of HTG chiefs must

be recognized in the Timber Supply Review, and consultation must occur with the chiefs.

The Hupacasath First Nation says their first priority is ensuring the sustainability of the resources within their territory, to fulfill their role as stewards and so they can fully exercise their aboriginal rights. They say a Hupacasath land use plan must be developed and an AAC established for their territory.

Clayoquot Sound

The Orval Resource Management Group, in a submission on behalf of Interfor, raises various questions about the assumptions used to define the AAC for the Clayoquot Sound portion of the TSA. These issues include:

- the definition of inoperable areas in three Timber Licence areas, given the improved technology available.
- the rate of growth assumptions. The proposed AAC suggests annual growth of only 1.85 cubic metres per year, while recent harvesting occurred on a site with a growth rate of 15 cubic metres per year. Given the extent of good and medium sites, the group suggests an average growth rate of eight cubic metres per year should be used.
- the land base reductions for reverted Timber Licences are not explained. Except for losses to roads and slides, all plantation areas should contribute to the AAC.
- the 87 per cent reduction of unreverted Timber Licence area, due to inoperability. Closer scrutiny is needed.

Socio-Economic Factors

A submission from Pacific Rainforest Adventure Tours says a high quality tourism experience depends on the conservation of resources and the protection of diverse ecosystems. This submission says there is currently not a balance between harvesting and ecosystem protection, and this is required soon as proven by the Sensitive Ecosystems Inventory. This submission also expresses the belief that the TSA is not as dependent on the forest industry as it is on tourism, and notes the lack of representation of tourism stakeholders in land and resource management planning.

Greenmax Resources says the socio-economic analysis gives the impression that lower levels of employment in the forest sector are inevitable and acceptable. The company says they do not share this opinion and a proactive approach would stimulate economic activity. They suggest finding a solution to the undercut of the AAC so that employment can increase.

Other Comments

Many submissions comment on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Timber Supply Review Process

The Clayoquot Sound Central Region Board expresses support for the use of the same assumptions in this Timber Supply Review as in previous reviews.

An individual submission expresses the hope this process will be more democratic and responsive to residents than was the Vancouver Island Land Use Plan process.

Three submissions say the Timber Supply Review should be put on hold, no AAC should be set, and no further logging allowed until there's a complete inventory of private and Crown lands, and a commitment to an ecosystem-based or landscape level plan that includes entire watersheds regardless of tenure. The following reasons are offered:

- the huge amount of private forest land that is virtually unregulated and provides water supplies for all east coast communities must be brought into an overall plan.
- a higher level plan is needed to define a conservation vision that allows 12 per cent of a biologically diverse and endangered ecosystem to be protected, consistent with

recent scientific data.
- future tourism employment opportunities and recreational needs require a secure land base.

Greenmax Resources expresses the opinion that the focus of the *Analysis Report* is an attempt to justify the further reduction of the working forest area, which they do not support. They say this focus indicates a preservationist approach that minimizes the important contributions of sustainable forest resource management, especially near the urban/rural interface.

Management Practices and Tenures
An individual submission says that from a biological perspective, it's apparent present forest management is not sustainable because it negatively impacts biodiversity, wildlife habitat, recreation, tourism, culture and watersheds. This individual says it's time to make the industry responsible for the damage it does and to implement practices that are sustainable and not destructive to so many other systems.

A submission from WCWC asks various questions about the E&N lands, and says it's imperative that access to Crown land within the E&N area be the same as for every other area of Crown land in BC (access for conservation, recreation, tourism and woodlots).

Harvest Levels
Coast Mountain Hardwoods requests that the AAC for their deciduous forest licence be increased retroactive to 1996, because the AAC was based on a significant underestimate of the volume per hectare and the net operable land base. The company says they want their AAC increased to 9,000 cubic metres and will provide technical information to support that request.

The Hupacasath First Nation say they do not support an AAC above the long-term harvest level because it is not sustainable, and they do not agree with the short-term liquidation of old growth that is used to rationalize that situation.

Orval Resource Management Group, on behalf of Interfor, addresses the AAC for the Clayoquot portion of the TSA. The Group says the base case harvest forecast of 11,000 cubic metres per year should be reconsidered in favour of a substantial upward adjustment. The following reasons are provided:
- the definition of inoperable and the growth rate assumptions are too conservative.
- the industry is in crisis and unemployment is growing, yet the AAC is being reduced by 11 per cent on a land base that can support a higher cut.
- the need to increase yields and product quality, and expand the THLB.

Orval says that, based on comparisons with TFL 54, the AAC for the Clayoquot portion should range from 35,935 cubic metres to 48,148 cubic metres.

Appendix 1

Submissions received by the South Island Forest District

Submissions received on the Data Package

Interest groups
Clayoquot Sound Central Region Board

Forest industry
Coast Mountain Hardwoods Inc.
The Coulson Group

General public
One individual submission

Submissions received on the Timber Supply Analysis Report

First Nations
Cowichan Tribes
Hupacasath First Nation
Hul'qumi'num Treaty Group

Forest industry
Orval Resource Management Group (on behalf of Interfor)
Greenmax Resources

Interest groups
Neighbours of Little Qualicum
Western Canada Wilderness Committee, Mid-Island Chapter

General public
One individual submission